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February 25, 2025

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Knowles v. Boxcar Inc.*
Case No.: 1:24-cv-8584

Dear Judge Caproni,

The undersigned represents Carlton Knowles, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Boxcar Inc., ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for March 7, 2025, at 10:00 AM (Dkt. 4) be adjourned for 60 days because Counsel for Defendant has not yet answered or appeared in this action. This request will grant ample time for the Defendant to retain counsel and for Defendant's Counsel to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an adjournment.

Respectfully submitted,

GOTTLIEB & ASSOCIATES PLLC

/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

Application DENIED. The Initial Pretrial Conference scheduled for Friday, March 7, 2025, at 10:00 A.M. is ADJOURNED *sine die*.

Defendant's deadline to answer or otherwise respond to the Complaint remains **Friday, March 7, 2025**. If Defendant does not respond to the Complaint by that date, Plaintiff must move for default judgment by **Thursday, March 13, 2025**, in accordance with Attachment A of the Undersigned's Individual Practices in Civil Cases.

Plaintiff is further directed to serve a copy of this Order on Defendant and file proof of service on the docket by **Friday, February 28, 2025**.

SO ORDERED.



2/26/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE